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Northern Lights Solutions, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ENGINEERED COMPONENT
SOLUTIONS, LLC,

Plaintiff,

v.

NORTHERN LIGHTS SOLUTIONS,
INC. AND (ABC CORPS 1-5 AND
JOHN DOES 105, FICTITIOUS AND
CORPORATE ENTITIES AND
INDIVIDUALS),

Defendants.

Civil Action No. _____

NOTICE OF REMOVAL

Defendant Northern Lights Solutions, Inc. ("Defendant") hereby files this notice of removal of this civil action to the United States District Court for the District of New Jersey from the Superior Court of New Jersey, Law Division, Monmouth County, Docket No: 11-002378. Removal is pursuant to 28 U.S.C. §§ 1441 and 1446.

1. On May 16, 2011, plaintiff Engineered Component Solutions, LLC ("Plaintiff") filed an action against Defendant in the Superior Court of New Jersey, Law Division, Monmouth County, docket number 11-002378 (the "State Court Action").

2. Upon information and belief, Plaintiff served the complaint and summons in the State Court Action on Defendant on May 26, 2011. Copies of the complaint and summons are attached hereto as Exhibits A and B, respectively. Following service of the complaint and summons, Plaintiff and Defendant stipulated to extend Defendant's time to answer or otherwise respond to the Complaint for thirty (30) days. Subsequent stipulations extending Defendant's time to answer the complaint were filed on August 2, 2011 and August 31, 2011, respectively.

3. Upon information and belief, on September 28, 2011, Plaintiff filed a First Amended Complaint, Jury Demand and Designation of Trial Counsel (the "Amended Complaint"). A purported copy of the Amended Complaint was forwarded to counsel for Defendant via electronic mail prior to its filing with the clerk of the court for Monmouth County. A copy of the Amended Complaint received by counsel for Defendant is attached hereto as Exhibit C. To date, Defendant has not received a stamped "filed" copy of the Amended Complaint.

4. No other pleadings have been filed in the State Court Action. No court orders have been issued in the State Court Action.

5. The Complaint alleges diversity of citizenship between Plaintiff and Defendant. (Amended Compl., introductory paragraph, ¶ 1).

6. The Complaint requests "[d]amages for breach of contract in excess of \$100,000." (Amended Compl. ¶ 3(b)).

7. The State Court Action is a civil action over which this Court has jurisdiction under 28 U.S.C. § 1332(a)(3) because the amount in controversy exceeds the sum of \$75,000 and diversity of citizenship exists between Plaintiff and Defendant.

8. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b).

9. This Notice of Removal is accompanied by copies of all available process, pleadings and orders in the State Court Action, including copies of the initial and amended complaint served upon counsel for Defendant. (Exhibits A - C).

10. Promptly after filing this Notice of Removal, a true and correct copy will be filed with the Clerk of the Superior Court of New Jersey, Law Division, in Monmouth County, New Jersey.

11. Written notice of the filing of this Notice of Removal will be given to Plaintiff pursuant to 28 U.S.C. § 1446(d).

12. By filing this Notice of Removal, Defendant does not waive any defenses that may be available to it.

WHEREFORE, Defendant, Northern Lights Solutions, Inc. hereby seeks removal of the State Court Action to this Court and respectfully requests that the action proceed in this Court as a matter properly removed.

BAYARD, P.A.

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Dated: October 28, 2011